

March 8, 2000

VIA AIRBORNE EXPRESS

Donna M. Caton
Chief Clerk
ILLINOIS COMMERCE COMMISSION
527 E. Capitol Avenue
Springfield, IL 62794-9280

**Re: MCI WorldCom Response to Ameritech's Operational Support System
("OSS") Revised Plan of Record Filed in Part March 1, 2000**

Dear Ms. Caton:

MCI WorldCom respectfully submits this response to the Operational Support System ("OSS") Revised Plan of Record ("Revised POR") that Ameritech filed with the Illinois Commerce Commission ("Commission") on March 1, 2000.¹

As discussed more fully below, despite deficiencies that exist in the Revised POR, MCI WorldCom recommends that the Commission expeditiously select a third party tester and allow the Revised POR to serve as a starting point for discussions among Competitive Local Exchange Carriers ("CLECs"), Ameritech, the Illinois Commission Staff ("Staff") and the third party tester. In making its recommendation, MCI WorldCom cautions the Commission to be cognizant of problems that CLECs encountered with Ameritech and SBC in the collaborative processes at the federal level. The Commission should make clear from the outset that the discussions and approach in Phase 2 of the three-phase OSS enhancement, integration, deployment and testing process should be open and not unduly limited by Ameritech's view of what the scope of the collaborative should be.

Based upon its initial review of the Revised POR, MCI WorldCom concludes that it is incomplete. For example, although Ameritech has been asked on numerous occasions whether it intends to make integrated pre-order and ordering functionality available in the form of parsed

¹There are 15 separate attachments to the Revised POR which are identified on the Commission's website. See <http://www.icc.state.il.us/icc/tc/cond29.asp>. The Revised POR, in which Ameritech has added some meat to the bones of its original offering, was filed in response to the Commission's rejection of the OSS POR that Ameritech filed on January 7.

Customer Service Requests (“CSRs”), Ameritech has not addressed this critical issue in its Revised POR,² although it is clearly aware of the importance of the issue to CLECs.

Other areas of the Revised POR are overly vague or contain proposed timelines that would leave commercially viable roll-out of competition too far off into the future. For example, the timely implementation of a Graphical User Interface (“GUI”), including additional provisioning functions for pre-order is extremely important. Ameritech states in its Revised POR that it will implement an enhanced version of Verigate that is utilized in the SWBT and Pacific Bell and Nevada Bell regions.³ While this is more information than was provided initially, Ameritech does not propose to implement this until March 2001. So, timing of implementation will be an issue.

Similarly, timely implementation of an ordering GUI is also extremely important. Ameritech states it will implement an enhanced version of the LEX application currently available in the SWBT and Pacific Bell and Nevada Bell regions, but again not until March 2001.⁴

With regard to Electronic Data Interchange (“EDI”) for ordering, Ameritech asserts that it will be updating its application-to-application ordering interface to be “consistent with the EDI 10 (LSOG 4)” in August 2000.⁵ The Revised POR, however, fails to describe in any useful detail what it means to be “consistent” with EDI 10 (Local Service Order Guideline (“LSOG”) 4). CLECs are left to guess what functionality will be available through the “LSOG 4-consistent” interface that Ameritech intends to provide.

Donna Caton

²The Federal Communications Commission (“FCC”) recognized the importance of an integrated pre-order and order functionality with back office system capabilities in its order granting the Section 271 application of Bell Atlantic for New York. See *Application of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, Memorandum Opinion and Order, CC Docket No. 99-295, released Dec. 22, 1999, ¶ 137. The FCC found that “application-to-application interfaces [which] allow competing carriers to integrate pre-ordering information into Bell Atlantic’s ordering interface and the carriers’ back office systems, [is] a finding that is fundamental to a BOC’s showing of nondiscriminatory access to OSS.” *Id.*

³Revised POR, p. 31.

⁴Revised POR, p. 36.

⁵Revised POR, p. 36.

March 8, 2000

Page Three

Suffice it to say there is much in the Revised POR with which MCI WorldCom disagrees (timing of implementation). Furthermore, there are still important questions that remain unanswered (e.g., preorder/order integration). Nevertheless, MCI WorldCom believes at this point that parties should move forward with the information made available to begin discussions to identify areas of agreement and areas of disagreement and, to the extent necessary, to get these issues before the Commission. MCI WorldCom believes that it is critical for the third party tester to be a part of such discussions from the outset. Accordingly, the Commission should select the third party tester prior to scheduling the first OSS collaborative.

In addition, based upon experience in the advanced services OSS collaborative at the federal level, MCI WorldCom urges the Commission to make clear that the four corners of the Revised POR do not constitute the universe of issues that are appropriate for discussion and resolution during the OSS collaborative. In other words, Ameritech should not be able to dictate the parameters of the collaborative discussions based upon what it has or has not seen fit to include in its Revised POR. Any attempts to unduly restrict the scope of the collaborative could lead to delays, as happened in the Ameritech/SBC Advanced Services OSS collaborative at the FCC.⁶ In short, Ameritech's revised POR may be an appropriate document from which discussions can evolve, but the topics for discussion in the Illinois OSS collaborative cannot be limited by the content or lack of content of Ameritech's Revised POR.⁷ The Commission should make this clear before the collaborative commences.

Donna Caton

March 8, 2000

⁶See Letter from Lawrence E. Strickling, Chief, FCC Common Carrier Bureau, to Charles Foster, Group President, SBC Communications, Inc., released Feb. 24, 2000, FCC DA 00-336 ("FCC Extension Letter"). The FCC required Ameritech/SBC to extend the OSS for xDSL collaboratives an additional three weeks to March 17, 2000 in order to cover some issues that CLECs had argued SBC inappropriately excluded from January and February workshops (e.g., access to records, databases and back-end systems; real-time flow through of orders; explain affiliate operating environment and relationship to the ILEC (to allow for parity); line sharing; continued support for pre-qualification; clarify type of service field; methods and procedures docs; in part, population of loop qual data; descriptions of pre-ordering and ordering processes. The FCC Extension Letter is appended to these comments and identified as Attachment A.

⁷Indeed, in Wisconsin, a Statement of Principles was agreed to by Ameritech and various CLECs outlining the manner in which discussions would proceed and referencing commitments concerning areas appropriate for third party testing (e.g., change management procedures, implementation of certain OSS enhancements prior to testing, products, including UNE-P, that should be tested, etc.) and areas that should be discussed which were not included in the Illinois Revised POR (parsed CSRs). That document is also instructive in terms of what Ameritech agreed would constitute appropriate test plans and procedures to utilize. Statement of Principles, p. 4. The Wisconsin Statement of Principles is appended to these comments and identified as Attachment B.

Page Four

For all of the foregoing reasons, MCI WorldCom respectfully submits that the Commission should expeditiously select a third party tester prior to scheduling the first OSS collaborative. The Commission should allow the Revised POR to serve as a starting point for discussions among CLECs, Ameritech, the Staff and the third party tester. The Commission should make clear from the outset that the discussions and approach in the Illinois OSS should be open and that just because issues were not addressed by Ameritech in its Revised POR does not mean that the issues should not have been, and does not mean that CLECs don't have a right to have those issues raised in the collaborative and, if necessary, resolved by the Commission.

If you have any questions regarding this correspondence, please call me.

Very truly yours,

Darrell S. Townsley

Enclosures

cc: Chairman Mathias
Commissioner Harvill
Commissioner Hurley
Commissioner Kretschmer
Patrick E. McLarney
Frank Bodine
Sam McClerren
Nancy Atkinson
G. Darryl Reed
Thomas G. Aridas